

1 **BLACK & LOBELLO**

2 Todd Kennedy, Esq.

3 Nevada Bar No.6014

4 10777 W. Twain Ave., Ste 300

5 Las Vegas, NV 89135

6 Tel: (702) 869-8801

7 Fax: (702) 869-2669

8 tkennedy@blacklobello.law

9 **GREENBERG GLUSKER FIELDS**
10 **CLAMAN & MACHTINGER LLP**

11 Ricardo Cestero, Esq.

12 (*Admitted Pro Hac Vice*)

13 1900 Avenue of the Stars 21st Floor

14 Los Angeles, California 90067

15 Phone: (310) 553-3610

16 Fax: (310) 201-2309

17 rcestero@greenbergglusker.com

18 *Attorneys for Defendant Golden Boy*
19 *Promotions, Inc.*

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 POUND FOR POUND PROMOTIONS, INC., a
23 Nevada corporation,

24 Case No.: 2:16-cv-01872 GMN (PAL)

25 Plaintiff,

26 vs.

27 GOLDEN BOY PROMOTIONS, INC., a
28 California corporation; and DOES 1-100, inclusive,

29 **STIPULATION AND ORDER TO**
30 **EXTEND TIME TO FILE REPLY**
31 **BRIEF**

32 **[FIRST REQUEST]**

33 Pursuant to LR 7-1 and LR IA 6-1, and Pound for Pound Promotions, Inc. (“Plaintiff”)
34 and Golden Boy Promotions, Inc. (“Defendant”) (collectively the “Parties”) stipulate as follows:

35 1. Defendant filed on August 15, 2016, a Motion to Transfer Venue [ECF No. 7].

36 2. Plaintiff timely filed on September 1, 2016, its Response to the Motion to
37 Transfer [ECF Nos. 12 and 13]. Plaintiff also filed on that same day a Motion to Remand [ECF
38 No. 14].

39 ///

1 3. Defendants Reply in Support of the Motion to Transfer is presently due on
2 Monday, September 12, 2016. Defendant's Response to the Motion to Remand is due on
3 Monday, September 19, 2016.

4 4. Defendant's Reply in support of its Motion to Transfer and Defendant's Response
5 to the Motion to Remand will have significant overlap on one of the primary issues raised in
6 Plaintiff's Response to Motion to Transfer and Plaintiff's Motion to remand: whether there exists
7 diversity jurisdiction.

8 5. Because of this overlap, the Parties stipulate that the time for Defendant to file its
9 Reply in support of its Motion to Transfer shall be extended seven (7) days, to September 19,
10 2016, the same day Defendant is required to respond to Plaintiff's Motion to Remand so that
11 Defendant may file both briefs on those overlapping issues on the same day.

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

BLACK & LOBELLO
10777 W. Twain Avenue, 3rd Floor
Las Vegas, Nevada 89135
(702) 869-8801 FAX: (702) 869-2669

1 6. This is the first request for an extension of time for Defendant to file its Reply in
2 support of its Motion to Transfer.

3 Dated this 8th day of September, 2016.

4 **BLACK & LOBELLO**

5
6 /s/ Todd E. Kennedy, Esq.
7 Todd E. Kennedy, Bar #6014
8 10777 W. Twain Ave., Ste 300
9 Las Vegas, NV 89135
10 Attorneys for Defendant
11 Golden Boy Promotions, Inc.

12 **GREENBERG GLUSKER FIELDS
13 CLAMAN & MACHTINGER LLP**

14 Ricardo Cestero, Esq.
(*Admitted Pro Hac Vice*)
15 1900 Avenue of the Stars 21st Floor
16 Los Angeles, California 90067
17 Phone: (310) 553-3610
18 Fax: (310) 201-2309

19 Dated this 8th day of September, 2016.

20 **ANDERSON, McPHARLIN & CONNERS, LLP**

21
22 /s/ Carleton R. Burch, Esq.
23 Carleton R. Burch, Esq.
24 Sue Trazig Cavaco, Esq.
25 601 S. Seventh Street
26 Las Vegas, NV 89101
27 Attorneys for Plaintiff
28 Pound For Pound Promotions, Inc.

29 **LAW OFFICES OF MARC T. LITTLE, PLC**

30 Marc T. Little, Esq.
(*Admitted Pro Hac Vice*)
31 445 South Figueroa Street, Suite 3100
32 Los Angeles, California 90071
33 888-353-5999 (Direct)
34 213-559-0544 (Fax)

35 IT IS SO ORDERED:

36 
37 _____
38 UNITED STATES MAGISTRATE JUDGE

39 DATED: September 15, 2016

40 **BLACK & LOBELLO**

41 10777 W. Twain Avenue, 3rd Floor
42 Las Vegas, Nevada 89135
43 (702) 869-8801 FAX: (702) 869-2669

CERTIFICATE OF SERVICE

I certify that I caused the above Stipulation and Order to be served via the Court's CM/ECF service on counsel for Plaintiff in this action on September 8, 2016.

/s/ Shirley Blackburn
An Employee of Black & LoBello

BLACK & LOBELLO
10777 W. Twain Avenue, 3rd Floor
Las Vegas, Nevada 89135
(702) 869-8801 FAX: (702) 869-2666